

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF OKLAHOMA**

**IN RE: BROILER CHICKEN GROWER  
ANTITRUST LITIGATION (NO. II)**

Case No. 6:20-md-02977-RJS-CMR

Hon. Chief Judge Robert J. Shelby

Magistrate Judge Cecilia M. Romero

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**NON-PARTY WILLIAM LOVETTE’S MOTION TO QUASH PLAINTIFFS’  
THIRD-PARTY DEPOSITION SUBPOENA OR, IN THE ALTERNATIVE,  
FOR A PROTECTIVE ORDER TO STAY DEPOSITION**

Non-party William Lovette respectfully moves this Court to quash Plaintiffs’ third-party deposition subpoena to Mr. Lovette or, alternatively, for a protective order to stay the deposition pending resolution of a related criminal case. In support of this motion, Mr. Lovette submits an accompanying memorandum in support. For the reasons set forth more fully in that memorandum, Mr. Lovette’s motion should be granted.<sup>1</sup>

WHEREFORE, non-party William Lovette respectfully requests that this Honorable Court (1) enter an order quashing the subpoena; or (2) in the alternative, enter a protective order staying the deposition pending resolution of the related criminal case.

Respectfully submitted this 30th day of August 2021.

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<sup>1</sup> Pursuant to LCvR 7.1(f), counsel for Mr. Lovette represents that John A. Fagg, Jr. (officing in Charlotte, NC) conferred with Plaintiffs’ counsel (officing in Philadelphia, PA) via e-mail and telephone conversations in a good faith effort to resolve this dispute without court intervention but was unable to resolve the dispute.

August 30, 2021

s/Phillip G. Whaley

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*\*pro hac vice application pending*

*Attorneys for William Wade Lovette*

**CERTIFICATE OF SERVICE**

I hereby certify that on August 30, 2021, I electronically transmitted the attached document to the Clerk of Court using the Electronic Filing System for filing. Based on the records currently on file in this case, the Clerk of Court will transmit a Notice of Electronic Filing to those registered participants of the ECF System.

s/Phillip G. Whaley

Phillip G. Whaley